

November 30, 2012

***Via Electronic Filing***

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, DC 20554

**Re: *Ex Parte* Presentation, WT Docket Nos. 12-70 and 04-356, ET Docket No. 10-142**

Dear Ms. Dortch:

On November 28, 2012, Chris Guttman-McCabe, Vice President, and Scott Bergmann, Assistant Vice President, CTIA–The Wireless Association® (“CTIA”), along with Joe Marx, AT&T, Chris Wiezoreck, T-Mobile, and Tamara Preiss, Verizon, and Tom Dombrowsky, Wiley Rein, met with Renee Gregory, Legal Advisor to Chairman Julius Genachowski, John Leibovitz of the Wireless Telecommunications Bureau, and Ron Repasi, Mark Settle, and Michael Ha of the Office of Engineering and Technology to discuss recent filings by the United States GPS Industry Council (“USGIC”) requesting that the Federal Communications Commission (“Commission”) adopt GPS-specific technical requirements in its ongoing AWS-4 proceeding.<sup>1</sup>

Consistent with CTIA’s prior advocacy,<sup>2</sup> CTIA reiterated that there is no need for Commission action or GPS-specific regulation in this instance. CTIA noted that GPS operations, located at 1559-1610 MHz band, are nearly 400 MHz away from the lowest point of the proposed AWS-4 spectrum located at 2000-2020 MHz. Given this wide separation, it is highly unlikely transmitters operating in AWS-4 spectrum pose any interference risk to GPS. CTIA also explained that the proposed 43 + 10 log<sub>10</sub>(P) dB of attenuation proposed in the AWS-4 NPRM is completely consistent with past FCC regulation of out of band emissions – and has not led to any reports of harmful interference. Finally, CTIA noted that while parties are entitled to enter into commercial agreements (and, indeed, the incumbent licensee has made specific commitments in this case), FCC codification of unnecessary rules is neither required nor would constitute good precedent in this instance. For these reasons, CTIA encouraged the Commission to decline to adopt unnecessary and inappropriate regulation of, or license condition on, commercial mobile services.

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<sup>1</sup> See e.g., Letter from Stephen D. Branch, Counsel for the United States GPS Industry Council to Marlene H. Dortch, Secretary, FCC, WT Docket No. 12-70 (Oct. 9, 2012).

<sup>2</sup> See e.g., Letter from Christopher Guttman-McCabe to Marlene H. Dortch, Secretary, FCC, WT Docket Nos. 12-70 and 04-356, ET Docket No. 10-142 (Oct. 25, 2012).

Pursuant to Section 1.1206 of the Commission's rules, 47 C.F.R. § 1.1206, this letter is being electronically filed via ECFS with your office and a copy of this submission is being provided to the meeting attendees. Please direct any questions to the undersigned.

Sincerely,

*/s/ Scott K. Bergmann*

Scott K. Bergmann

cc: Renee Gregory  
John Leibovitz  
Ron Repasi  
Mark Settle  
Michael Ha